

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

**LANA M. PAAVOLA, Individually, and as
Administrator of the ESTATE OF JOEL D.
PAAVOLA, deceased,**

Plaintiffs,

v.

**UNITED STATES OF AMERICA,
DISTRICT OF COLUMBIA, and HOPE
VILLAGE, INC.,**

Defendants.

Civil Action No. 3:19-cv-269

JURY DEMAND

**AFFIDAVIT OF JEFFREY VARONE, CEO OF HOPE VILLAGE, INC., IN SUPPORT
OF MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

DISTRICT OF COLUMBIA

I, Jeffrey Varone, after being first duly sworn according to law, do make oath and affirm
as follows:

1. I am over the age of 18 and I am competent to make this Affidavit.
2. I am the CEO of Hope Village, Inc., which is a privately owned entity that owns
and operates a community correction and/or residential reentry center located at 2840 Langston
Place, S.E., Washington, D.C. 20020. This is the only location where Hope Village, Inc. provides
services or otherwise conducts any business.
3. Hope Village, Inc. is a corporation incorporated under the laws of the District of
Columbia and has its principal place of business within the District of Columbia at 2840 Langston
Place, S.E., Washington, D.C. 20020. It is a citizen of the District of Columbia.
4. Hope Village, Inc. is not and has never been incorporated under the laws of
Tennessee or any other state.

5. Hope Village, Inc. has no interest in and does not use, possess, own, lease, operate, or manage any real property within the State of Tennessee, nor has it ever.

6. Hope Village, Inc. has never transacted business within the State of Tennessee.

7. Hope Village, Inc. has never contracted to supply services or things in the State of Tennessee.

8. Hope Village, Inc. has never done business, solicited business, engaged in any other persistent course of conduct, or derived substantial revenue from goods used or consumed or services rendered in the State of Tennessee, nor has Hope Village, Inc. contracted to insure any person, property or risk located within the State of Tennessee.

9. Hope Village, Inc. has never met Lana M. Paavola or Joel D. Paavola.

10. Hope Village, Inc. has never spoken to Lana M. Paavola or Joel D. Paavola.

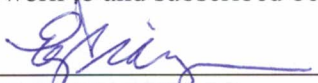
11. Hope Village, Inc. has never entered into a contract with Lana M. Paavola or Joel D. Paavola.

12. Hope Village, Inc. has no contact with the State of Tennessee whatsoever.


JEFFREY VARONE, as CEO of Hope Village, Inc.

DISTRICT OF COLUMBIA

Sworn to and subscribed before me this 30th day of April, 2019.


NOTARY PUBLIC

My Commission Expires: 04/22/22